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*A GCC REPRESENTATIVE OFFICE
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ALLIANCES IN MEXICO
AND SRI LANKA

December 1, 2021

VIA ECF AND EMAIL

The Honorable Robert B. Kugler
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

Special Master the Honorable
Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, Case No. 1:19-md-02875-RBK: Defendants'
Memoranda of Law in Opposition to Plaintiffs' Motions to
Preclude the General Causation Opinions of Seven of Defendants'
Disclosed Experts**

Dear Judge Kugler and Special Master Vanaskie:

Pursuant to CMO 23 and Federal Rule of Civil Procedure 702, please find enclosed courtesy copies of the following memoranda of law in opposition to Plaintiffs' motions to preclude the general causation opinions of seven of Defendants' disclosed experts and supporting materials, which are being filed today by the Defense Executive Committee on behalf of all Defendants in the above-captioned action:

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- I. Michael B. Bottorff, Pharm.D.
 - A. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert Michael B. Bottorff, Pharm.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibits A through X

- II. Janice Britt, Ph.D.
 - A. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude the Opinions of Defense Expert Janice Britt, Ph.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibit A

- II. Daniel Catenacci, M.D.
 - A. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert Daniel Catenacci, M.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibits A through L

- III. John M. Flack, M.D.
 - A. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert John M. Flack, M.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibits A and B

- IV. John P. Fryzek, MPH, Ph.D.
 - A. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert Jon P. Fryzek, MPH, Ph.D.
 - B. Certification of Seth A. Goldberg, Esq., attaching Exhibits A through E

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- V. George Johnson, Ph.D.
 - a. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert George Johnson, Ph.D.
 - b. Certification of Seth A. Goldberg, Esq., attaching Exhibits A through Q

- VI. Lee-Jen Wei, Ph.D.
 - a. Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert Lee-Jen Wei, Ph.D.
 - b. Certification of Seth A. Goldberg, Esq., attaching Exhibits A through D

Please let us know if we can provide any other materials.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Defendants' Executive Committee (via email)
Plaintiffs' Executive Committee (via email)